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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

BEE, DENNING, INC., d/b/a
PRACTICE PERFORMANCE
GROUP, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

CAPITAL ALLIANCE GROUP,

Defendant.

NO. '13CV2654 DMS WVG

**CLASS ACTION COMPLAINT
FOR DAMAGES AND
INJUNCTIVE RELIEF**

DEMAND FOR JURY TRIAL

I. INTRODUCTION

1.1 Plaintiff Bee, Denning, Inc., d/b/a Practice Performance Group, individually and as a class representative for a National Class of all others similarly situated, brings this class action against Defendant for violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA"), and alleges as follows:

II. PARTIES

2.1 Plaintiff Bee, Denning, Inc., d/b/a Practice Performance Group (“Plaintiff”) is a company that provided consultation and continuing education for physicians based in La Jolla, California. Practice Performance Group is owned and operated by Judy Bee and Jeffrey Denning. Plaintiff is, and all times mentioned herein was, a “person” as defined by 47 U.S.C. § 153(39).

2.2 Defendant Capital Alliance Group (“Capital Alliance” or “Defendant”) is a California corporation that maintains its principal place of business at 1950 East 17th Street, 3rd Floor, Santa Ana, California, 92705. Capital Alliance is, and all times mentioned herein was, a “person” as defined by 47 U.S.C. § 153(39).

III. JURISDICTION AND VENUE

3.1 This court has subject matter jurisdiction under 28 U.S.C § 1331, as the action arises under the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*, which is a federal statute.

3.2 This Court has personal jurisdiction over Defendant because it does business in California and many of the wrongful acts alleged in the Complaint were committed in California.

3.3 Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the wrongful acts alleged in the Complaint occurred in this judicial District.

IV. THE TELEPHONE CONSUMER PROTECTION ACT OF 1991, 47 U.S.C. § 227

4.1 In 1991, Congress enacted the Telephone Consumer Protection Act, 47 U.S.C. § 227 (“TCPA”) in response to a growing number of consumer complaints regarding certain telemarketing practices, including preventing the transmission of unsolicited facsimiles (or “junk faxes”). Junk faxes impose unwanted burdens on the contacted party, including the costs of paper and ink and making fax machines unavailable for legitimate business purposes.

1 4.2 The TCPA makes it unlawful “to use any telephone facsimile
2 machine, computer, or other device to send, to a telephone facsimile machine, an
3 unsolicited advertisement.” *See* 47 U.S.C. §§ 227(b)(1)(C).

4 4.3 The TCPA defines “unsolicited advertisement” as “any material
5 advertising the commercial availability or quality of any property, goods, or
6 services which is transmitted to any person without that person’s express
7 invitation or permission.” *See* 47 U.S.C. §§ 227(a)(4).

8 4.4 The TCPA provides a private cause of action to persons who receive
9 facsimiles in violation of 47 U.S.C. § 227(b)(1)(C). *See* 47 U.S.C. § 227(b)(3).

10 **V. FACTUAL ALLEGATIONS**

11 5.1 Defendant Capital Alliance Group provides short term business
12 loans and equipment financing and leasing to small to middle-sized companies.
13 On information and belief, part of Defendant’s strategy for increasing the volume
14 of its customers involves sending unsolicited facsimile advertisements to solicit
15 business, many of which are made to recipients who have not consented to
16 receive these facsimiles.

17 5.2 On or about August 14, 2013, Plaintiff received a fax offering
18 “SHORT TERM BUSINESS LOAN – FAST AND SIMPLE”. The fax
19 advertised that it provided capital for small businesses as an alternative to
20 traditional bank financing.

21 5.3 The fax encouraged the reader to go to www.communitybf.com or
22 call 1-800-950-4042. Upon information and belief, the website, phone number
23 and contact email are all owned maintained and operated by Defendant. Upon
24 information and belief, Defendant is responsible for initiating the sending of the
25 above-described fax.

26 5.4 Plaintiff received similar faxes from Defendant again on September
27 9, 2013 and September 23, 2013.

1 5.5 Defendant's faxes to Plaintiff's fax line were advertisements,
2 soliciting Plaintiff to obtain a credit line or other services through Defendant.

3 5.6 Plaintiff did not provide prior consent to the receipt of faxes from
4 Defendant, did not voluntarily agree to make its facsimile number available for
5 public distribution, did not invite or give permission to Defendant to use its fax
6 number, and had no established business relationship with Defendant.

7 5.7 Upon information and belief, Defendant initiated a large number of
8 substantially similar unsolicited fax advertisements to persons in California and
9 throughout the United States.

10 5.8 Upon information and belief, Defendant intends to continue to send
11 similar unsolicited fax advertisements to persons in California and throughout the
12 United States.

13 **VI. CLASS ACTION ALLEGATIONS**

14 6.1 Class Definition. Plaintiff brings this action pursuant to Federal Rule
15 of Civil Procedure 23(b)(2) and Rule 23(b)(3) on behalf of itself and a class (the
16 "Class") defined as follows:

17 All persons or entities in the United States who, on or
18 after four years prior to the filing of this action, received
19 one or more unsolicited facsimile messages containing
20 an advertisement that was initiated by or on behalf of
21 Defendant, or its agents or affiliates with whom
22 Defendant did not have an established business
23 relationship or with whom Defendant did not obtain
24 prior express permission to send a fax.

25 Excluded from the Class are Defendant, any entity in which a Defendant has a
26 controlling interest or that has a controlling interest in a Defendant, and
27 Defendant's employees or agents, legal representatives, assignees, and
28 successors. Also excluded are the judge to whom this case is assigned and any
member of the judge's immediate family.

 6.2 Numerosity. Defendant has sent unsolicited facsimile messages
containing an advertisement similar to that received by Plaintiff to numerous

1 other Class members who did not have an established business relationship with
2 Defendant or otherwise consent to the receipt of the facsimile. The Class
3 members number in the thousands, such that joinder of all members is
4 impracticable. The disposition of the claims of the Class in a single action will
5 provide substantial benefits to all parties and the Court.

6 6.3 Adequacy. Plaintiff will fairly and adequately represent and protect
7 the interests of the other members of the Class. Plaintiff has retained counsel
8 with substantial experience in prosecuting complex litigation and class actions.
9 Plaintiff and its counsel are committed to vigorously prosecuting this action on
10 behalf of the members of the Class, and have the financial resources to do so.
11 Neither Plaintiff, nor his counsel, has any interest adverse to those of the other
12 members of the Class or each other.

13 6.4 Superiority. Absent a class action, most members of the Class would
14 find the cost of litigating their claims to be prohibitive, and will have no effective
15 remedy. The class treatment of common questions of law and fact is also superior
16 to multiple individual actions or piecemeal litigation in that it conserves the
17 resources of the courts and the litigants, and promotes consistency and efficiency
18 of adjudication.

19 6.5 Typicality. The factual and legal bases of Defendant's liability to
20 Plaintiff and to the other members of the Class are the same, resulting in injury to
21 Plaintiff and to all of the other members of the Class as a result of the receipt of
22 the unsolicited facsimile advertisement alleged herein. Plaintiff and the other
23 Class members have all suffered harm and damages as a result of Defendant's
24 unlawful and wrongful conduct based on the receipt of the unsolicited facsimile
25 advertisement. Defendant has acted and failed to act on grounds generally
26 applicable to Plaintiff and the other members of the Class in initiating the
27 unsolicited facsimile advertisements at issue, requiring the Court's imposition of
28

1 uniform relief to ensure compatible standards of conduct toward the members of
2 the Class.

3 6.6 Commonality. There are many questions of law and fact common to
4 the claims of Plaintiff and the other members of the Class, and those questions
5 predominate over any questions that may affect individual members of the Class.
6 Common questions for the Class include but are not limited to the following:

7 a. Whether the initiation of the unsolicited facsimile
8 advertisement by Defendant and/or its agents, affiliates and/or others acting on
9 Defendant's behalf violate 47 U.S.C. § 227 and 46 CFR § 64.1200;

10 b. Whether Defendant and/or its agents, affiliates and/or others
11 acting on Defendant's behalf should be enjoined from violations 47 U.S.C. § 227
12 and 46 CFR § 64.1200 in the future; and

13 c. Whether Class members are entitled to treble damages based
14 on the willfulness of Defendant's conduct.

15 6.7 Predominance. Defendant engaged in a common course of conduct
16 toward Plaintiff and the Class. The common issues arising from the conduct that
17 affect Plaintiff and the Class predominate over any individual issues.

18 **VII. FIRST CLAIM FOR RELIEF** 19 **VIOLATION OF 47 U.S.C. § 227(b)(1)(C)**

20 7.1 Plaintiff incorporates by reference the foregoing allegations as if
21 fully set forth herein.

22 7.2 The foregoing acts and omissions of Defendant and/or its affiliates,
23 agents and/or other persons or entities acting on Defendant's behalf constitute
24 numerous and multiple violations of the TCPA, 47 U.S.C. § 227(b)(1)(C).

25 7.3 As a result of Defendant's and/or its affiliates, agents and/or other
26 persons or entities acting on Defendant's behalf negligent and/or willful
27 violations of the TCPA, 47 U.S.C. § 227(b)(1)(C), Plaintiff is entitled to an award
28 of \$500 in statutory damages for each and every negligent facsimile in violation

1 of the statute, pursuant to 47 U.S.C. § 227(b)(3)(B) and treble damages of up to
2 \$1,500 for each and every knowing and/or willful facsimile in violation of the
3 statute, pursuant to 47 U.S.C. § 227(b)(3).

4 7.4 Plaintiff is also entitled to and does seek injunctive relief prohibiting
5 Defendant and/or its agents, affiliates, and/or other persons or entities acting on
6 Defendant's behalf from violating the TCPA, 47 U.S.C. § 227(b)(1)(C), in the
7 future.

8 **VIII. RELIEF REQUESTED**

9 Plaintiff requests the Court enter judgment against Defendant as follows:

10 A. An order certifying the Class as defined above;

11 B. An award of actual and statutory damages, including for statutory
12 damages of \$500 for each legal violation committed by Defendant, plus treble
13 damages for each intentional and/or willful legal violation;

14 C. Granting declaratory, equitable and/or injunctive relief as permitted
15 by law to ensure that Defendant will cease to initiated the sending of unsolicited
16 facsimile advertisements;

17 D. An award of reasonable attorneys' fees and costs; and

18 E. Such further and other relief as the Court deems fair and equitable.

19 **IX. DEMAND FOR JURY TRIAL**

20 Pursuant to Fed. R. Civ. P. 38(b), Plaintiff demands a trial by jury of any
21 and all issues in this action so triable of right.

1 RESPECTFULLY SUBMITTED AND DATED this 5th day of November,
2 2013.

3 TERRELL MARSHALL DAUDT
4 & WILLIE PLLC

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25 *Attorneys for Plaintiff*
26
27
28

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

BEE, DENNING, INC., d/b/a/ PRACTICE PERFORMANCE GROUP,
individually and on behalf of all others similarly situated

(b) County of Residence of First Listed Plaintiff San Diego
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

SEE ATTACHED

DEFENDANTS

CAPITAL ALLIANCE GROUP

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known) **'13CV2654 DMS WVG**

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES | |
|---|--|--|---|---|---|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | | |

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
47 U.S.C. § 227; 5:552

Brief description of cause:

Violation of Telephone Consumer Protection Act

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

11/05/2013

SIGNATURE OF ATTORNEY OF RECORD

/s/ Beth E. Terrell, CSB #178181

FOR OFFICE USE ONLY

RECEIPT # _____

AMOUNT _____

APPLYING IFP _____

JUDGE _____

MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

Bee, Denning, Inc., d/b/a Practice Performance Group v. Capital Alliance Group

ATTACHMENT TO CIVIL COVER SHEET

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